



414 Nicollet Mall  
Minneapolis, Minnesota 55401-1993

EPA Region 5 Records Ctr.



313807

February 22, 2006

Mr. Scott Hansen  
Remedial Response Branch, Region 5  
U.S. EPA (SR-6J)  
77 West Jackson Blvd.  
Chicago, IL 60604

RE: Ashland Lakefront Site: CERCLA Docket No. V-W-04-C-764: Revised Schedule and Proposed Table of Contents for the Remedial Investigation (RI) Report

Dear Mr. Hansen:

As we discussed at our meeting in Chicago on February 17, 2005, the schedule contained in the Final RI/FS Work Plan (URS, February 2005) must be updated to reflect the additional work activities and other circumstances that have occurred since the work plan was approved on December 7, 2004. We described these developments at our meeting.

Attached for your review and approval is a revised proposed schedule projecting when the various components of the RI will be submitted to U. S. EPA for review and approval. NSPW believes its proposal is aggressive and responsive to concerns of various stakeholders while it also reflects the unforeseeable events that have occurred since the development of the work plan in 2004. The revised schedule provides a periodic submission of deliverables aimed at providing an efficient and systematic review process on the part of U. S. EPA and other interested stakeholders.

Also included in this submission is the proposed Table of Contents for the RI report which we also discussed during our meeting. In contrast to the revised schedule, NSPW is not requesting approval of this item but rather is providing it for purposes of review and discussion, if necessary.

If you have any questions, please give me a call at 612-330-2928.

Sincerely,

A handwritten signature in black ink that reads 'Jerry C Winslow'.

Jerry C. Winslow  
Principal Environmental Engineer

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Enclosures (2)

cc: Sharon Jaffess (w enclosures)  
Jamie Dunn, WDNR Project Manager, (w enclosures)  
Rae Ann Maday, Bad River Band of Lake Superior Chippewa, (w enclosures)  
Laura Armagost, Red Cliff Band of Lake Superior Chippewa, (w enclosures)

**Ashland/NSP Lakefront Site  
Proposed RI Outline**

Executive Summary

- 1 Introduction
  - 1.1 Purpose of Report
  - 1.2 Site Background
    - 1.2.1 Site Description
    - 1.2.2 Site History
  - 1.3 Report Organization
- 2 Study Area Investigation/Technical Approach
  - 2.1 Field Methods
    - 2.1.1 Site Mapping
    - 2.1.2 Surface Water and Sediment Investigations
    - 2.1.3 Geological Investigations – Surface/Subsurface Soil/Geophysics
    - 2.1.4 Groundwater Investigations
    - 2.1.5 Soil Vapor and Air Quality Investigation
    - 2.1.6 Ecological Investigations
  - 2.2 Laboratory Methods
    - 2.2.1 Soil Vapor/Air
    - 2.2.2 Groundwater
    - 2.2.3 Soil
    - 2.2.4 Sediment and Surface Water
    - 2.2.5 Benthic Organisms
- 3 Site Physical Characteristics
  - 3.1 Regional and Site Geology (incl surface/subsurface soil/geophysics)
  - 3.2 Regional and Site Hydrogeology
  - 3.3 Surface Water Hydrology
  - 3.4 Sediment Stability
  - 3.5 Ecology
  - 3.6 Meteorology
  - 3.7 Demographics and Land Use
- 4 Nature and Extent of Contamination
  - 4.1 Contaminant Sources
  - 4.2 Soils and Vadose Zone
  - 4.3 Groundwater
  - 4.4 Surface Water and Sediments
  - 4.5 Air
- 5 Contaminant Fate and Transport
  - 5.1 Contaminant Characteristics and Persistence
  - 5.2 Potential Routes of Migration/Contaminant Transport Processes
  - 5.3 Contaminant Distribution and Trends

**Ashland/NSP Lakefront Site  
Proposed RI Outline**

- 6 Conceptual Site Model
- 7 Baseline Human Health Risk Assessment
  - 7.1 Introduction
  - 7.2 Hazard Identification
  - 7.3 Dose-Response Assessment
  - 7.4 Exposure Assessment
  - 7.5 Risk Evaluation
- 8 Baseline Ecological Risk Assessment
  - 8.1 Introduction
  - 8.2 Problem Formulation
  - 8.3 Analysis
  - 8.4 Risk Characterization
- 7 Summary and Conclusions
  - 7.1 Summary
    - 7.1.1 Nature and Extent of Contamination
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    - 7.1.3 Risk Assessment
  - 7.2 Conclusions
    - 7.2.1 Data Limitations and Recommendations for Future Work
    - 7.2.2 Recommended Remedial Action Objectives

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- A. Remedial Action Options Technical Memoranda
- B. Supplementary Documents
  - B.1 Forensic Report
  - B.2 Sediment Stability Report
  - B.3 Geophysics Report
  - B.4... (Additional Reports as necessary)
- C. HHRA Methods
- D. BERA Methods
- E. Boring Logs
- F. Analytical Data and QA/QC Evaluation Results

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**Ashland/NSP Lakefront Superfund Site**

BERA/RI Schedule  
Revised February 17, 2006

ID	Task Name	Duration	Start	Finish	Nov	Qtr 1, 2005 Jan	Mar	May	Qtr 3, 2005 Jul	Sep	Nov	Qtr 1, 2006 Jan	Mar	May	Qtr 3, 2006 Jul
38	EPA Review	60 days	Wed 5/31/06	Tue 8/22/06											
39	<b>Human Health Risk Assessment</b>	189 days	Sat 7/23/05	Fri 4/7/06											
40	Problem Formulation	26 days	Sat 7/23/05	Tue 8/23/05											
41	Toxicity Assessment	37 days	Wed 8/24/05	Thu 10/13/05											
42	Exposure Assessment	25 days	Wed 11/16/05	Tue 12/20/05											
43	Risk Characterization	83 days	Wed 11/23/05	Fri 3/17/06											
44	Internal Review	14 days	Mon 3/20/06	Thu 4/6/06											
45	Delivery to EPA	1 day	Fri 4/7/06	Fri 4/7/06											
46	EPA Review	60 days	Mon 4/10/06	Fri 6/30/06											
47	<b>Sediment Stability Study</b>	233 days	Tue 5/10/05	Thu 3/16/06											
48	Deploy Current Meters	25 days	Tue 5/10/05	Mon 6/13/05											
49	Retrieve Current Meters	1 day	Tue 6/14/05	Tue 6/14/05											
50	<b>Sediment Cores (Vertically Stratified)</b>	75 days	Thu 6/16/05	Wed 9/14/05											
51	Radiometric Analysis	45 days	Thu 6/16/05	Wed 8/3/05											
52	Data Validation	30 days	Thu 6/16/05	Wed 9/14/05											
53	Chemical Analysis	45 days	Thu 6/16/05	Wed 8/3/05											
54	Data Validation	30 days	Thu 8/4/05	Wed 9/14/05											
55	<b>Sediment Cores (SEDFLUME)</b>	60 days	Wed 6/22/05	Tue 8/30/05											
56	Flume Study	30 days	Wed 6/22/05	Sat 7/23/05											
57	Report	30 days	Sun 7/24/05	Tue 8/30/05											
58	<b>Hydrographic Study</b>	89 days	Mon 6/20/05	Thu 10/6/05											
59	Bathymetric Survey	5 days	Mon 6/20/05	Fri 6/24/05											
60	Sidescan Survey	5 days	Mon 6/20/05	Fri 6/24/05											
61	Sub Bottom Survey	5 days	Mon 6/20/05	Fri 6/24/05											
62	Data Reduction	45 days	Mon 6/27/05	Fri 8/12/05											
63	Produce Report and GIS Maps	80 days	Fri 7/1/05	Thu 10/6/05											
64	<b>Sediment Stability Report</b>	85 days	Fri 11/18/05	Thu 3/16/06											
65	Report Preparation	60 days	Fri 11/18/05	Thu 2/9/06											
66	Peer Review	16 days	Fri 2/10/06	Fri 3/3/06											
67	Delivery to EPA	1 day	Thu 3/16/06	Thu 3/16/06											
68	<b>Remedial Investigation Report</b>	136 days	Mon 11/28/05	Mon 6/5/06											
69	RI Report Preparation	120 days	Mon 11/28/05	Fri 5/12/06											
70	Internal Review	15 days	Mon 5/15/06	Fri 6/2/06											
71	Delivery to EPA	1 day	Mon 6/5/06	Mon 6/5/06											
72	EPA Review	60 days	Tue 6/6/06	Mon 8/28/06											

Project: Ashland/NSP Lakefront Site  
Date: Thu 2/16/06

<b>Task</b>		<b>Summary</b>		<b>Rolled Up Progress</b>		<b>Deadline</b>	
<b>Split</b>		<b>Rolled Up Task</b>		<b>External Tasks</b>			
<b>Progress</b>		<b>Rolled Up Split</b>		<b>Project Summary</b>			
<b>Milestone</b>		<b>Rolled Up Milestone</b>		<b>External Milestone</b>			

**Ashland/NSP Lakefront Superfund Site**  
**BERA/RI Schedule**  
 Revised February 17, 2006

ID	Task Name	Duration	Start	Finish	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
1	<b>Sediment Remedial Investigation</b>	361 days	Tue 12/7/04	Tue 4/11/06																					
2	<b>Fish Tissue Collection</b>	42 days	Thu 4/21/05	Fri 6/17/05																					
3	Snell Collection	6 days	Thu 4/21/05	Thu 4/28/05																					
4	Second Field Effort	4 days	Tue 6/14/05	Fri 6/17/05																					
5	<b>Supplemental Sediment Sampling</b>	5 days	Mon 6/13/05	Fri 6/17/05																					
6	<b>Sediment Quality Triad Study</b>	245 days	Mon 5/9/05	Fri 3/6/06																					
7	Reconnaissance Study	10 days	Mon 5/9/05	Fri 5/20/05																					
8	SQT Sampling	13 days	Mon 6/13/05	Wed 6/29/05																					
9	Re-Sample Sand Reference Stations	1 day	Tue 9/27/05	Tue 9/27/05																					
10	<b>Sediment Chemistry</b>	130 days	Mon 6/27/05	Fri 12/9/05																					
11	Bulk Sediment Chemistry	96 days	Mon 6/27/05	Mon 10/24/05																					
12	Data Validation	45 days	Wed 9/28/05	Tue 11/29/05																					
13	PAH Forensics	96 days	Mon 6/27/05	Mon 10/24/05																					
14	Data Validation	45 days	Mon 10/10/05	Fri 12/9/05																					
15	Petrographic Analysis	45 days	Mon 6/27/05	Fri 8/12/05																					
16	Field UV Measurement Bright Day	1 day	Wed 8/31/05	Wed 8/31/05																					
17	Field UV Measurement Cloudy Day	1 day	Wed 8/31/05	Wed 8/31/05																					
18	Sediment Bioassay	178 days	Sat 7/9/05	Fri 3/3/06																					
19	Benthic Community Analysis	140 days	Fri 6/24/05	Thu 12/22/05																					
20	<b>Surface Water Quality Sampling</b>	45 days	Mon 1/30/06	Fri 3/31/06																					
21	Sediment Quality Triad Report	118 days	Fri 6/17/05	Tue 11/15/05																					
22	Low Energy Event	1 day	Fri 6/17/05	Fri 6/17/05																					
23	High Energy Event	1 day	Tue 11/15/05	Tue 11/15/05																					
24	<b>Terrestrial Studies</b>	62 days	Thu 6/16/05	Fri 8/26/05																					
25	Wetland Characterization	62 days	Thu 6/16/05	Fri 8/26/05																					
26	Field Survey	1 day	Thu 6/16/05	Thu 6/16/05																					
27	Report	30 days	Fri 7/22/05	Fri 8/26/05																					
28	<b>Wildlife Habitat Survey</b>	62 days	Thu 6/16/05	Fri 8/26/05																					
29	Field Survey	1 day	Thu 6/16/05	Thu 6/16/05																					
30	Report	30 days	Fri 7/22/05	Fri 8/26/05																					
31	<b>Baseline Ecological Risk Assessment Report</b>	226 days	Sat 7/23/05	Tue 5/30/06																					
32	Problem Formulation	134 days	Sat 7/23/05	Fri 1/20/06																					
33	Effect Analysis	139 days	Mon 8/8/05	Thu 2/16/06																					
34	Exposure Analysis	68 days	Wed 11/23/05	Fri 2/24/06																					
35	Risk Characterization	100 days	Mon 12/12/05	Fri 4/28/06																					
36	Internal Review	21 days	Mon 5/1/06	Mon 5/29/06																					
37	Delivery to EPA	1 day	Tue 5/30/06	Tue 5/30/06																					

Task

Split

Progress

Milestone

Summary

Rolled Up Task

Rolled Up Split

Rolled Up Milestone

Rolled Up Progress

External Tasks

Project Summary

External Milestone

Deadline

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